

**UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS**

<b>Comcast of Southern New England, Inc.</b>	)	<b>Case No.: 1:05-cv-11413-PBS</b>
	)	
Plaintiff,	)	
	)	
vs.	)	<b>PLAINTIFF'S SECOND MOTION TO</b>
	)	<b>EXTEND TIME TO MOVE FOR</b>
	)	<b>DEFAULT JUDGMENT</b>
<b>Magda Siotas</b>	)	
	)	
Defendant	)	
	)	

---

**NOW COMES** the Plaintiff in the above-captioned case and respectfully requests that this Court extend the deadline for the Plaintiff to move for default judgment to March 24, 2006.

As grounds, the Plaintiff states:

1. In addition to the grounds set forth in its prior Motion, which still pertain, the Plaintiff seeks additional time to make further attempts at settlement negotiations with the Defendant.
2. The additional time is necessary in that Plaintiff is hoping to receive documents from Defendant soon. Part of the problem in not completing negotiations earlier is that English is not the first language of the Defendant or those at her home and there is some difficulty in communicating.
3. It is the intent of the Plaintiff to file for Default Judgment if this case cannot be resolved in the near future.

Respectfully Submitted for the Plaintiff,  
Comcast of Southern New England, Inc.  
By Its Attorney

2/28/06  
Date

/s/ John M. McLaughlin  
John M. McLaughlin (BBO: 556328)  
**Green, Miles, Lipton & Fitz-Gibbon LLP**  
77 Pleasant Street  
P.O. Box 210  
Northampton, MA 01061-0210  
(413) 586-0865

**CERTIFICATE OF SERVICE**

I, John M. McLaughlin, attorney for the Plaintiff, hereby certify that on the 28<sup>th</sup> day of February 2006, a copy of the foregoing motion and affidavit were sent via first class mail to:

Magda Siotas  
12 Astor Street  
Lowell, MA 01852

/s/ John M. McLaughlin  
John M. McLaughlin

**UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS**

<b>Comcast of Southern New England, Inc.</b>	)	Case No.: <b>1:05-cv-11413-PBS</b>
	)	
Plaintiff	)	<b>AFFIDAVIT OF ATTORNEY IN</b>
	)	<b>SUPPORT OF PLAINTIFF'S SECOND</b>
vs.	)	<b>MOTION TO EXTEND TIME TO MOVE</b>
	)	<b>FOR DEFAULT JUDGMENT</b>
<b>Magda Siotas</b>	)	
	)	
Defendant	)	

Now comes John M. McLaughlin, Attorney for the Plaintiff in the above-entitled action,  
and, on oath, states the following:

1. In addition to the grounds set forth in my prior Motion, which still pertain, I need additional time to make further attempts at settlement negotiations with the Defendant.
2. The additional time is necessary in that I am hoping to receive documents from the Defendant soon. Part of the problem in not completing negotiations earlier is that English is not the first language of the Defendant or those at her home and there is some difficulty in communicating.
3. It is my intent to file for Default Judgment if this case cannot be resolved in the near future.

Subscribed and sworn to, under the pains and penalties of perjury.

Respectfully Submitted for the Plaintiff,  
Comcast of Southern New England, Inc.  
By Its Attorney,

2/28/2006

Date

/s/ John M. McLaughlin

John M. McLaughlin (BBO: 556328)

**Green Miles Lipton & Fitz-Gibbon LLP**

77 Pleasant Street

P.O. Box 210

Northampton, MA 01061-0210

(413) 586-0865